IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

WRS, INC., d/b/a WRS MOTION PICTURE LABORATORIES, a corporation	)	
Plaintiff,	)	No. 2:00-CV-2041-AJS
v.	)	
PLAZA ENTERTAINMENT, INC., a corporation, ERIC PARKINSON, an individual, CHARLES von BERNUTH, an individual and JOHN HERKLOTZ, an individual	)	
Defendants	)	

DEFENDANT CHARLES VON BERNUTH'S SUPPLEMENT TO RESPONSE TO MOTION TO MODIFY ORDER OF FEBRUARY 20, 2007 TO EXPRESS THAT COUNTERCLAIMS WERE DISMISSED, OR, IN THE ALTERNATIVE, MOTION TO MODIFY ORDER OF JULY 29, 2005

AND NOW COMES Defendant Charles von Bernuth files this Supplement to Response to Motion to Modify Order of February 20, 2007 to Express that Counterclaims Were Dismissed, or, in the Alternative, Motion to Modify Order of July 29, 2005 ("Supplemental Response"), averring as follows:

1. Defendant Charles von Bernuth files this Supplemental Response for two reasons.

2. The first is to draw this Court's attention to additional authorities for the proposition that discharge in bankruptcy has no effect on the defense of recoupment, including the recent decision of the United States Bankruptcy Court for the Western District of Pennsylvania in *In re Sargent Elec. Co.*, 341 B.R. 514, 520-21 (Bankr. W.D. Pa. March 15,

2006) and section 28:48 of the Bankruptcy Service, Lawyers Edition § 28:48, which collects cases and is attached hereto as Exhibit A.

3. The second reason for filing this Supplemental Response is to place in the record the complete Seconded Amended Plan of Reorganization filed in the WRS bankruptcy proceedings, which was inadvertently truncated and filed without the last three pages as Exhibit A to the Mr. von Bernuth's Brief in Opposition to Motion to Modify Order of February 20, 2007 to Express that Counterclaims Were Dismissed.

4. Accordingly, the complete Second Amended Plan of Reorganization is attached hereto as Exhibit B.

Respectfully submitted,

/s/ James R. Walker
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Date: November 30, 2007

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing has been served, by the Court's ECF/CM system and by U.S. First Class Mail, Postage Pre-Paid, upon the on this 30th day of November, 2007, as follows:

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